UNITED STATES DISTRICT COURT FOR THE DISTRCIT OF PUERTO RICO

T	D	_
ın	к	e

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	PROMESA TITLE III
as representative of	CASE NO. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO et al.,	(Jointly Administered)
Debtors. 1	

INFORMATIVE MOTION AND NOTICE OF REQUEST TO BE HEARD AT THE JUNE 28, 2019 HEARING

To the Honorable United States District Court Judge Laura Taylor Swain and United States Magistrate Judge Judith Dein:

Tradewinds Energy Barceloneta, LLC, a member of the Official Committee of Unsecured Creditors ("<u>Tradewinds</u>") submits this informative motion in response to the Court's Hearing Procedures Order [Docket No. 7524] (the "<u>Order</u>") setting forth guidelines for parties wishing to be heard at the June 28, 2019 hearing (the "<u>Hearing</u>").

1. The Order requests that counsel who intend to present oral argument at the Hearing (as defined in the Scheduling Order) file an informative motion stating their name, the party for which they intend to appear, what location they intend to appear from, and the motion on which they intend to argue.

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

- 2. John Arrastia or Jesus M. Suarez of Genovese Joblove & Battista, P.A. will appear in person on behalf of Tradewinds at the Hearing in Courtroom 17C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007. Counsel intends to present oral argument, as necessary, on the Urgent Motion of Official Committee of Unsecured Creditors for Order, Pursuant to Bankruptcy Code Section 926(a), Authorizing Committee to Pursue Avoidance Actions on Behalf of Puerto Rico Electric Power Authority [Case No. 17-BK-3283, Docket. No. 7484; Case No. 17-BK-4780, Docket No. 1354].
- 3. Reggie Diaz or Jose J. Sanchez-Velez of Bermúdez Díaz & Sánchez LLP intends to be present in the courtroom in San Juan, Puerto Rico.
- 4. Tradewinds reserves its right to be heard on (i) any objections, responses, statements, joinders, or replies to any of the foregoing; and (ii) any other matter raised by any party at the Hearing related to the Title III cases or the interests of Tradewinds.

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

Dated: June 25, 2019.

/s/ José J. Sánchez-Vélez

José J. Sánchez-Vélez
Bermúdez Díaz & Sánchez LLP
USDC PR No. 214606
jsanchez@bdslawpr.com
Edificio Ochoa Suite 200
500 Calle de la Tanca
San Juan, PR 00901
Tel. 787-523-2670
Fax. 787-523-2664
rdiaz@bdslawpr.com

Counsel to Tradewinds Energy Barceloneta, LLC

/s/ Jesus M. Suarez

John H. Genovese, Esq. (Pro Hac Vice)
John Arrastia, Esq. (Pro Hac Vice)
Jesus M. Suarez, Esq. (Pro Hac Vice)
Mariaelena Gayo-Guitian (Pro Hac Vice)
GENOVESE JOBLOVE & BATTISTA, P.A.
100 SE 2nd Street, Suite 4400
Miami, FL 33131
Tel. 305-349-2300
jgenovese@gjb-law.com
jarrastia@gjb-law.com
jsuarez@gjb-law.com
mguitian@gjb-law.com
Counsel to
Tradewinds Energy Barceloneta, LLC